

CIVIL COMPLAINT FORM TO BE USED BY A *PRO SE* PRISONERIN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIARobert Tamir Wilkerson 05-29950

Full Name of Plaintiff Inmate Number

v.

Lycoming County Prison

Name of Defendant 1

Brad A. Shoemaker

Name of Defendant 2

Ryan C. Barnes

Name of Defendant 3

Christopher J Ebner

Name of Defendant 4

Name of Defendant 5

(Print the names of all defendants. If the names of all defendants do not fit in this space, you may attach additional pages. Do not include addresses in this section).

Civil No. _____
(to be filled in by the Clerk's Office)

☐ Demand for Jury Trial☐ No Jury Trial DemandFILED
WILLIAMSPORT

MAR 05 2025

PER NR
DEPUTY CLERK

I. NATURE OF COMPLAINT

Indicate below the federal legal basis for your claim, if known.

☐ Civil Rights Action under 42 U.S.C. § 1983 (state, county, or municipal defendants)☐ Civil Rights Action under Bivens v. Six Unknown Federal Narcotics Agents, 403 U.S. 388 (1971) (federal defendants)☐ Negligence Action under the Federal Tort Claims Act (FTCA), 28 U.S.C. § 1346, against the United States

II. ADDRESSES AND INFORMATION

A. PLAINTIFF

Wilkerson Robert Tamir

Name (Last, First, MI)

05-29950

Inmate Number

Lycoming County Prison

Place of Confinement

277 West Third Street

Address

Williamsport, Lycoming County, PA, 17701

City, County, State, Zip Code

Indicate whether you are a prisoner or other confined person as follows:

- ☐ Pretrial detainee
- ☒ Civilly committed detainee
- ☐ Immigration detainee
- ☐ Convicted and sentenced state prisoner
- ☐ Convicted and sentenced federal prisoner

B. DEFENDANT(S)

Provide the information below for each defendant. Attach additional pages if needed.

Make sure that the defendant(s) listed below are identical to those contained in the caption. If incorrect information is provided, it could result in the delay or prevention of service of the complaint.

Defendant 1:

Lycoming County Prison

Name (Last, First)

Current Job Title

277 West Third Street

Current Work Address

Williamsport, Lycoming County, PA, 17701

City, County, State, Zip Code

Defendant 2:

Brad A Shoemaker

Name (Last, First)

Warden

Current Job Title

277 West Third Street

Current Work Address

Williamsport, Lycoming County, PA, 17701

City, County, State, Zip Code

Defendant 3:

Ryan C Barnes

Name (Last, First)

Deputy Warden of Security and Operations

Current Job Title

277 West Third Street

Current Work Address

Williamsport, Lycoming County, PA, 17701

City, County, State, Zip Code

Defendant 4:

Christopher J Ebner

Name (Last, First)

Deputy Warden of Inmate Services

Current Job Title

277 West Third Street

Current Work Address

Williamsport, Lycoming County, PA, 17701

City, County, State, Zip Code

Defendant 5:

Name (Last, First)

Current Job Title

Current Work Address

City, County, State, Zip Code

III. STATEMENT OF FACTS

State only the facts of your claim below. Include all the facts you consider important. Attach additional pages if needed.

A. Describe where and when the events giving rise to your claim(s) arose.

Lycoming County Prison, DLU G-Block Unit
August 15 2024 - March 5 2025

B. On what date did the events giving rise to your claim(s) occur?

August 15 2024 Through March 5 2025

C. What are the facts underlying your claim(s)? (For example: What happened to you? Who did what?)

Cruel and Unusual punishment as well as torture
tactics are still being forced upon me. The lights
in the DLU G-Block unit are on 22 out of 24 hours
which is causing sleep deprivation, The lights are
on all day and night; The lights are controlled by
correctional officers as they stripped our ability to
turn the lights on or off. None of the inmates housed on
G-Block are under suicide supervision, therefore there is no reason
for the lights to be on in the cells. This is a violation of
the 8th Amendment as "cruel and unusual punishment
is being performed. Also we're being sanctioned for
attempting to cover the lights that prevent us from sleeping.
Due to being sanctioned for this matter of covering the lights
is additional DLU to further our punishment.

IV. LEGAL CLAIM(S)

You are not required to make legal argument or cite any cases or statutes. However, state what constitutional rights, statutes, or laws you believe were violated by the above actions. If you intend to assert multiple claims, number and set forth each claim in separate paragraphs. Attach additional pages if needed.

Lycoming County Prisons staff is in violation of the 8th Amendment as cruel and unusual punishment is being performed against me.

V. INJURY

Describe with specificity what injury, harm, or damages you suffered because of the events described above.

Sleep deprivation, depression, anxiety, delusion, mood swings, sight distortion.

VI. RELIEF


State exactly what you want the court to do for you. For example, you may be seeking money damages, you may want the court to order a defendant to do something or stop doing something, or you may be seeking both types of relief. If you are seeking monetary relief, state your request generally. Do not request a specific amount of money.

Monetary Compensation and everyone involved sanctioned.

VII. SIGNATURE

By signing this complaint, you represent to the court that the facts alleged are true to the best of your knowledge and are supported by evidence, that those facts show a violation of law, and that you are not filing this complaint to harass another person or for any other improper purpose.

Local Rule of Court 83.18 requires *pro se* plaintiffs to keep the court informed of their current address. If your address changes while your lawsuit is being litigated, you must immediately inform the court of the change in writing. By signing and submitting the complaint form, you agree to provide the Clerk's Office with any changes to your address where case-related papers may be served, and you acknowledge that your failure to keep a current address on file with the Clerk's Office may result in dismissal of your case.



Signature of Plaintiff



Date

Robert T Wilkerson

05-29950

Lycoming County Prison

P.O. Box 247

Phoenix MD 21131-0247

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United States District Court
Middle District of Pennsylvania
US Courthouse & Federal Building
240 West Third Street Suite 21
Williamsport PA 17701